



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
75 Hawthorne Street
San Francisco, CA 94105

April 24, 2017

Carol Spinos
Six Rivers National Forest
1330 Bayshore Way
Eureka, California 95501

Subject: Final Environmental Impact Statement for the Smith River National Recreation Area
Restoration and Motorized Travel Management Project (EIS No. 20170040)

Dear Ms. Spinos:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

We acknowledge the difficult job that the U.S. Forest Service (USFS) has in striking a balance among multiple uses on public lands. EPA is encouraged to see the USFS actively fostering citizen stewardship by reaching out to the U.S. Institute for Environmental Conflict Resolution Program, and working with the Del Norte County collaborative group to solicit recommendations on the Travel Management Project.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for this project and provided comments to the USFS on June 5, 2014. We rated all of the project alternatives as *Environmental Concerns – Insufficient Information (EC-2)* due to our concerns regarding project funding, impacts to water resources, and naturally occurring asbestos. We appreciate the Forest Service's responses to our comments. In particular, EPA acknowledges the disclosure of detailed cost estimate assumptions and methodology in Appendix G. Our remaining concerns and recommendations are discussed below.

Water Quality

The Altaville/Low Divide mining district, located in the headwaters of Hardscrabble and Copper Creeks, has been impacted by mining activity since at least 1860. EPA notes that the majority of the newly designated motorized trails proposed in the preferred Alternative, Alternative 6, are located on slopes above Hardscrabble Creek, a tributary to the Smith River, a designated Wild and Scenic River. EPA has continuing concerns that designating motorized trails in historically impacted areas will exacerbate existing environmental degradation by compacting soil, disturbing or eliminating vegetative cover, and decreasing water infiltration, thereby resulting in increased surface runoff and erosion. Such effects are magnified on steep slopes or in erosive, unstable soils, such as those found at historic mining sites.

The existing and anticipated maintenance backlog within the Smith River National Recreation Area (SRNRA) has the potential to pose short and long-term consequences for water quality. Delayed maintenance due to funding shortfalls would result in increased sediment loads in SRNRA watersheds from unmaintained roadways, resulting in impacts to fish habitat and increased potential for mass wasting events to alter channel morphology. EPA acknowledges the clarification and updated methodology for determining deferred and annual maintenance cost estimates that are provided in the Response to Comments, and notes that the magnitude of the additional financial shortfall from Alternative 6 is lower than that initially presented in the DEIS. We recommend prioritizing the storm-

proofing of newly designated motorized trails in the sensitive headwaters of Hardscrabble and Copper Creek, and implementing an adaptive approach to monitoring the actual maintenance workload and annual costs in implementing Alternative 6 to insure that funds are sufficiently available to prevent unintended environmental impacts.

Forest Resources

EPA acknowledges the efforts that USFS is taking to maintain the integrity of the exceptional Port-Orford-Cedar (POC) forest in SRNRA. In particular, increasing the “high-risk” rating distance for POC stands from 100 feet to 300 meters downstream of road crossings is an improvement to POC impacts analysis that demonstrates a commitment to incorporating current scientific understanding in forest resources impacts analysis. As the USFS continues managing these important resources into the future, EPA recommends further consideration of an adaptive road closure and management strategy based upon recent precipitation and ground conditions, rather than basing management actions on broadly outlining “dry” and “wet” seasonal closures. If a precipitation-based adaptive road closure plan is not feasible, EPA recommends updating the seasonal closure dates annually as an adaptive management strategy.

Air Quality and Naturally Occurring Asbestos

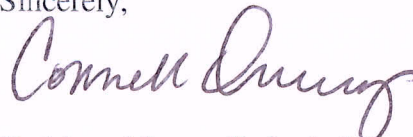
EPA continues to have concerns related to naturally occurring asbestos (NOA). We note that USFS has committed to providing NOA maps and exposure risk information at visitor service locations per the Draft Record of Decision and the Regional Forester’s direction on February 11, 2009. While disclosure is essential to managing the public health threat posed by NOA, we urge the USFS to prioritize the characterization of the health risks of NOA in the SRNRA, and consider resurfacing gravel roads containing NOA when funding becomes available in the future. EPA notes that the Department of Toxic Substances Control (DTSC) has recommended resurfacing roadways containing NOA as a result of an asbestos emission study in another motorized travel area in California¹.

Effects on Inventoried Roadless Areas

The Preferred Alternative designates three miles of UARs as motorized trails along the North Fork Smith Inventoried Roadless Area (IRA) boundary. Given that UARs typically branch from existing routes, it is reasonable to assume that a motorized trail along the border of an IRA would provide an opportunity for motorists to deliberately or inadvertently create new UARs in a Roadless Area, thereby creating new potential for erosion and sedimentation into nearby waters. For this reason, we recommend reconsideration of the designation of motorized trails along the IRA boundary.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact Patrick Kelly, the lead reviewer for this project, at (415) 972-3198, or kelly.patrickj@epa.gov.

Sincerely,



Kathleen Martyn Goforth, Manager
Environmental Review Section

cc via email: Alydda Mangelsdorf, North Coast Regional Water Quality Control Board

¹ http://www.dtsc.ca.gov/SiteCleanup/Projects/upload/Garden-Valley_FS_Asbestos-Study_0405.pdf